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Water Docket, Environmental Protection Agency
Mailcode 28221T
1200 Pennsylvania Ave., NW.
Washington, DC 20460
RE Docket ID No. EPA-R03OW-2010-0736

To whom it may concern:

We, would like to take this opportunity to encourage EPA and the individual states affected by the Chesapeake Bay TMDL to amend the planned activity item in the **Maryland Watershed Implementation Plan: Summary Table of Actions** described as *Poultry Litter Treatment.* We respectfully request that Kemira Klasp™ litter amendment be accepted and included as BMP for mitigating ammonia and phosphorus from Poultry farms.

Kemira Klasp™ has been shown to be effective at reducing ammonia and binding phopshorous in University trials and numerous commercial applications.[i12,3.] Attesting to this, is the fact that USDA/NRCS is currently providing cost share assistance for this litter amendment via Natural Resources Conservation Service Conservation Practice Standard ***Amendments for treatment of agricultural waste*** Code 591. Also supporting this is the well established science that the iron III molecule effectively sequesters phosphorous as phosphate and is the preferred management practice throughout most the pollution management industry; iron III being the basis of the KLASP phosphate treatment chemistry.

By not endorsing KLASP the industry would be left with only one commercially available litter amendment (alum) to receive credit as a BMP for improving the

Chesapeake Bay, EPA and would thereby also create an unfair competitive environment for this somewhat new but already well established product.

Additionally, a good number of poultry producers will be at a disadvantage as many will choose to continue using Klasp due its effectiveness on their farm compared to other BMP's.

In closing we strongly encourage you to include Klasp as an accepted BMP for mitigating ammonia and phosphorous on Chesapeake Bay poultry firms. Should you need more supporting data, please do not hesitate to contact us.

Respectfully Submitted:

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1.[i]Neal, Shockley, De-Chem LLC Unpublished data P concentrations using Klasp on Delmarva Poultry farms
2.Ritz, C.W., L.A. Harper, B.D. Fairchild, V. Johnson, J. Pavlicek. Ferric sulfate as a litter amendment in broiler houses. National Poultry Waste Management Symposium, Des Moines, IA, October 21-22, 2008.
3.Moore, P. A., Jr., and D. M. Miller. 1994. Decreasing phosphorus solubility in poultry litter with aluminum, calcium, and iron amendments. J. Environ. Qual. 23: 325-330.[i]

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